

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LISA-ATHENA S. ABU HANTASH, in her individual capacity and as mother and natural guardian of JORDAN-ANNETTEE JAZZMIN RICHARDSON, a minor, and JORDAN RICHARDSON, INC., a Virginia Corporation,

*Plaintiffs,*

-against-

V MODEL MANAGEMENT NEW YORK, INC.  
and VNY MODEL MANAGEMENT, LLC,

*Defendants.*

Docket No.: 07 Civ. 3363 (GBD) (KNF)

**AFFIRMATION OF GAVIN I.  
HANDWERKER, ESQ. IN SUPPORT  
OF PLAINTIFFS' MOTION**

**(ORAL ARGUMENT REQUESTED)**

GAVIN I. HANDWERKER, ESQ., an attorney duly admitted to practice law in the state and federal courts of New York affirms the following to be true under penalty of perjury:

1. I am a principal of the law firm Nissenbaum Law Group, LLC, attorneys for the Plaintiffs, Lisa-Athena S. Abu Hantash, in her individual capacity and as mother and natural guardian of Jordan-Annettee Jazzmin Richardson, a minor, and Jordan Richardson, Inc. As such, I am fully familiar with the facts and circumstances surrounding the within matter.

2. I submit this affirmation in support of Plaintiffs' motion for the entry of an Order: (a) pursuant to Fed. R. Civ. P. 12(f), striking certain portions of paragraphs 22, 34, 35, 36, 65, 66, 67, 73, 75, 77, 79, 89, 98, 99, 109, 110, 111 and 134 of Defendants' verified answer; (b) pursuant to Rule 12(f), striking Defendants' Eighth Affirmative Defense; (c) pursuant to Fed. R. Civ. P. 11(c), ordering sanctions against the Defendants and their counsel for violating, inter alia, Rule 8 and Rule 11; (d) awarding attorney's fees, costs and disbursements for the within motion; and, (f) granting such other, further and different relief as to this Court seems just, equitable and proper under the circumstances.

3. The within matter was commenced by the filing of a summons and verified complaint on April 30, 2007. A true and accurate copy of Plaintiffs' complaint (without exhibits) is annexed hereto as Exhibit A.

4. Service of the summons and complaint on Defendants V Model Management and VNY Model Management were effectuated on May 9, 2007 and May 2, 2007, respectively.

5. On May 24, 2007, my office received a copy of Defendants' verified answer, affirmative defenses and counterclaim. A true and accurate copy of Defendants' verified answer, affirmative defenses and counterclaim are annexed hereto as Exhibit B.

6. No prior application for the relief sought herein has been made to this or any other court of competent jurisdiction.

WHEREFORE it is respectfully requested that the court grant the within application in its entirety together with such other, further and different relief as to the Court seems just, equitable and proper under the circumstances.

Affirmed: May 31, 2007

/S/ GAVIN I. HANDWERKER  
GAVIN I. HANDWERKER (GIH6191)